
**BROWN
KWON &
LAM LLP**

Brown Kwon & Lam LLP
Attorneys at Law
521 Fifth Avenue, 17th Floor
New York, NY 10175
Tel.: (212) 295-5828
Fax: (718) 795-1642
Email: info@bkllawyers.com

Writer's Direct: Angela Kwon, Esq.
akwon@bkllawyers.com

MEMO ENDORSED

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March 17, 2023

Via ECF

Hon. Andrew L. Carter, Jr., U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

RE: *Maldonado, et al. v. New York Beer Co LLC d/b/a Jacob's Pickles, et al.*
Case No. 1:20-cv-10309 (ALC)

Dear Judge Carter:

We are counsel for Plaintiffs in the above-referenced action. We write, jointly with counsel for Defendants, to respectfully request an adjournment of the Final Approval Hearing for the proposed class action settlement, currently scheduled for April 3, 2023 at 12:00 P.M.

According to Court's Order granting preliminary approval of the settlement (ECF Dkt. No. 70), Defendants were directed to provide the class list to the Settlement Administrator in Microsoft Excel format within 10 days of the Order. Once the class list was received, the Administrator (i.e., Rust Consulting) was directed to disseminate the notice of class settlement within 20 days of the Order, and Class Members would have 60 days to opt out or object to the settlement. (See ECF Dkt. No. 70). This estimated timeline for class notice was based on the anticipation that Defendants would be providing the Administrator with one (1) Excel file containing the necessary class information outlined in the Court's Order and Settlement Agreement.

Although Defendants provided class-related data to the Administrator in a timely manner, such data was produced in more than six (6) different files, including a file with raw data for a subset of the Class Members to verify the basis of the information required by the Court for the Class Members – mainly the hours worked. The Administrator has undertaken efforts to compile and organize the data, eliminating redundancies, determining missing information, and seeking clarification and input from Defendants. Defendants and the Administrator have been working closely together in order to convert the data into a usable form for the class notice mailing. The parties intended on making this adjournment request sooner. Despite multiple requests, however, the Administrator has not been able to provide an estimated date for class notice due to the high uncertainty over when this issue will be resolved. While the Administrator is still unable to determine an exact date for class notice mailing, the parties conservatively estimate that the class data will be completed within the next three weeks.

Based on the foregoing, the parties respectfully request that (i) the deadline to disseminate class notice be extended to April 17, 2023, with 60 days for Class Members to opt out or object to

the settlement, and that (ii) the Final Approval Hearing, currently scheduled for April 3, 2023 at 12:00 P.M., be adjourned to a date that is on or after June 23, 2023. This is the parties' first request for an extension/adjournment.

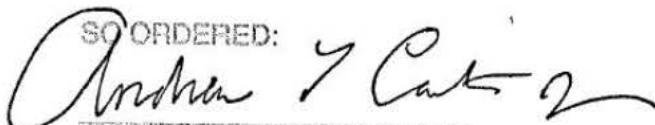
We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Angela Kwon
Angela Kwon, Esq.

cc: all parties via ECF

The parties' request is **GRANTED**. The deadline to disseminate class notice is extended until **April 17, 2023**. The final approval hearing will be held on **June 28, 2023 at 12:00 p.m. eastern time**. All parties shall appear and should contact the Court at **1-888-363-4749 (access code: 3768660)**.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: March 20, 2023